

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Berkley Risk Administrators Company, LLC, Rasmussen Agency, Inc., (d/b/a Berkley Risk Managers), All American Agency Facilities, Inc., and Federal Insurance Company, as assignee and subrogor,

Case File No. 06-2804 (PAM/JSM

Plaintiffs,

**AFFIDAVIT OF RYAN A. OLSON
IN SUPPORT OF MOTION TO
COMPEL DISCOVERY**

V.

Wells Fargo Bank, National Association,

Defendant.

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Ryan A. Olson, being first duly sworn, states and deposes as follows:

1. I am an attorney with Felhaber Larson Fenlon & Vogt, counsel for Plaintiffs in the above-captioned matter.

2. On February 14, 2007, Plaintiffs served their First Set of Interrogatories and Requests for Production of Documents on Defendant. Plaintiffs' Second Set of Interrogatories and Document Requests to Defendant Wells Fargo Bank were served on February 23, 2007.

3. Attached hereto is a true and correct copy of the following documents:

Exhibit A Plaintiffs' First Set of Interrogatories to Defendant Wells Fargo Bank

- Exhibit B Plaintiffs' First Set of Requests for Production of Documents to Defendant Wells Fargo Bank
- Exhibit C Plaintiffs' Second Set of Interrogatories and Document Requests to Defendant Wells Fargo Bank
- Exhibit D Defendant Wells Fargo Bank's Answers and Objections to Plaintiffs' First Set of Interrogatories
- Exhibit E Defendant Wells Fargo Bank's Response to Plaintiffs' First Set of Requests for Production of Documents
- Exhibit F Defendant Wells Fargo Bank's Answers and Objections to Plaintiffs' Second Set of Interrogatories and Document Requests
- Exhibit G May 3, 2007 Letter to Richard T. Thomson,
- Exhibit H May 11, 2007 Letter from Richard T. Thomson,
- Exhibit I May 16, 2007 Letter to Richard T. Thomson
- Exhibit J *3M Innovative Properties Co. v. Tomar Electronics*, Civ. No. 05-756 (MJD/AJB) 2006 WL 2670038 (D. Minn. Sept. 18, 2006) (unpublished)

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Dated: May 21, 2007

s/ Ryan A. Olson
Ryan A. Olson

Subscribed and sworn to before me
this 21 day of May, 2007.

s/Sonja M. Pederson
Notary Public

My Commission Expires: Jan. 31, 2011